SUPPORTING STATEMENT - FORM LETTER 26-626 REQUEST FOR IDENTIFYING INFORMTION RE: VETERAN'S LOAN RECORDS (2900-0317)

A. JUSTIFICATION

1. Under the general authority of the Secretary of the Department of Veterans Affairs (VA) cited in 38 U.S.C. 5103, "If a claimant's application for benefits under the laws administered by the Secretary is incomplete, the Secretary shall notify the claimant of the evidence necessary to complete the application. If such evidence is not received within one year from the date of such notification, no benefits may be paid or furnished by reason of such application."

2. Form Letter 26-626 is used by the field station to notify a correspondent that additional information is needed in order to determine if a veteran's loan guaranty benefit is involved, and if it is, to obtain the necessary information to associate the correspondence with the veteran's application or loan records.

3. Use of improved information technology does not apply. The Form Letter is issued by Loan Guaranty when additional information is requested. The letter must be returned with original correspondence.

4. The information is not contained in any other VA records. Similar information is not available elsewhere.

5. Collection of information does not involve small businesses or other small entities.

6. The collection of data is generally accomplished on a one-time basis per claimant request. Without this form, VA would not be able to obtain the necessary information to associate the correspondence with the veteran's application or loan records that would then result in non-payment of benefits.

7. There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

8. The Department notice was published in the Federal Register on July 9, 2010, pages 39618-39619. There were no comments in response to this notice.

9. No payments or gifts to respondents have been made under this collection of information.

10. <u>Loan Guaranty Home, Condominium and Manufactured Home Loan Applicant</u> <u>Records, Specially Adapted Housing Applicant Records, and Vendee Loan Applicant</u> <u>Records - VA (55VA26)</u> are contained in the Privacy Act Issuances, 2001.

11. No sensitive questions appear on the form.

12. Estimate of Information Collection Burden

a. The number of respondents per year is estimated at 2,400, with a completion time of 5 minutes per case.

b. Frequency of response is generally one time.

c. Annual burden is estimated at 200 hours.

d. The response time of 5 minutes per case is based on trial with Loan Guaranty staff.

e. The total estimated cost to respondents is \$36,000 (2,400 responses x \$15 per hour).

13. This submission does not involve any recordkeeping costs.

- 14. Estimate of Cost to the Federal Government
- \$5,008 Estimated Loan Guaranty Processing Cost for FY 2010 (2,400 cases x 5 minutes x \$25.04 per hour (average Loan Guaranty field salary))
- 15. There is no change in burden hours.
- 16. Information collection is not for publication purposes.

17. The collection instrument, VA Form Letter 26-626, may be reproduced and/or stocked by the respondents and veterans service organizations. This VA form letter does not display an expiration date, and if required to do so it would result in unnecessary waste of existing stocks of this form. These forms are submitted to OMB for approval every 3 years. As such, this date requirement would also result in an unnecessary burden on the respondents and would delay Department action on the benefit being sought. VA also seeks to minimize its cost to itself of collecting, processing, and using the information by not displaying the expiration date. For the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form Letter 26-626.

18. There is no exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

B. STATISTICAL METHODS

The data collection does not employ statistical methods.